



TECK GUAN PERDANA BERHAD

(Company No. 307097-A)
Incorporated in Malaysia

WHISTLEBLOWING POLICY

Revised 25th March 2021

WHISTLEBLOWING POLICY

1. POLICY STATEMENT & OBJECTIVES

Teck Guan Perdana Berhad (“the Company”) and its subsidiaries (“the Group”) are committed to the highest standard of integrity and maintaining high standard of accountability in the conduct of its businesses and operations. The Company aspires to conduct its affairs in an ethical, responsible and transparent manner which is vital to the success of the Group.

In line with this commitment, the Company’s Board of Directors has adopted this Whistleblowing Policy (“Policy”) to provides an avenue for employees of the Group and stakeholders to raise genuine concerns about unethical behaviour and improper conduct within the Group without fear of reprisal should they act in good faith when reporting such concerns.

The objectives of this Policy are to:

- a. Support the Company’s values and protect the long-term reputation of the Company/Group;
- b. Promote and maintain high transparency, accountability and good corporate governance in the workplace;
- c. Ensure that employees can raise concerns without fear of reprisals and safeguard such person’s confidentiality;
- d. Provide a transparent and confidential process for dealing with concerns; and
- e. Maintain a healthy working culture and an efficient Group.

2. SCOPE OF REPORTING AND CONSEQUENCES OF WRONGFUL DISCLOSURE

This policy is designed to facilitate employees and stakeholders to disclose (whistleblow) any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offence include, but not limited to the following:

- a. Fraud, forgery, theft and embezzlement;
- b. Corruption, bribery and blackmail;
- c. Harassment, abuses and intimidation;
- d. Conflict of interest and potential abuse of position/power;
- e. Disclosure of sensitive data or information to third party;
- f. Misuse and/or misappropriation of the Group’s funds or assets/property;
- g. Serious breaches of the Company’s procedures and internal controls and the Code of Ethics and Conduct;
- h. Conduct or activity which breaches any law or regulatory obligation; and
- i. Improprieties in matters of financial reporting.

Only genuine concerns should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith, accurate, factual, free from malicious intent and not made for personal gain. In addition, any disclosure which is found to be frivolous or vexatious or not acted

in good faith in general will not be entertained and that person shall not be entitled to any protection under this Policy.

3. REPORTING PROCEDURES

If any employee or external stakeholder believes reasonably and in good faith that malpractices exist in the Company, the employee or stakeholder should report this immediately to one or more of the following persons within the Company:

- i. Mr Tham Vui Vun, Board Chairman; or
- ii. Datuk Hong Ngit Ming, Managing Director.

Letter:

318, Teck Guan Regency
Jalan St. Patrick, Off Jalan Belunu
91000 Tawau, Sabah.

Electronic mail:

- 1. vvthamco@yahoo.com.my (tel: 089-762062)
- 2. hongnm@teckguan.com (tel: 089-772275)

The Whistleblower is encouraged to disclose his or her identity and contact details. The report should contain the following information:

- a. Type/nature of the alleged misconduct/wrongdoings and how it was perpetrated;
- b. Names of person(s) involved in the allegations;
- c. Time, location and dates of the incident took place;
- d. Other witness to the misconduct/wrongdoings;
- e. Any supporting evidence such as documents, photos, audio or video recordings; and
- f. Other relevant information

The Whistleblower may choose to make anonymous reporting but the Company reserves its right to investigate or not to investigate the anonymous disclosure.

4. PROTECTION TO WHISTLEBLOWER

The identity and personal information of the Whistleblower will be protected and kept confidential, unless the Whistleblower agrees otherwise or unless otherwise required by law. In addition, the Whistleblower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his disclosure of any improper conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the Whistleblower is mistaken as to the facts as well as the rules and procedures involved.

5. CONFIDENTIALITY

The Company shall treat all reports or disclosures as sensitive and confidential and will only reveal information on a “need to know” basis or if required by law, court or authority.

6. REVIEW

The Company reserves the right to amend this policy from time to time.